



The Illinois Association of Community Care Homecare Providers is an Association comprised of providers of the Illinois Department on Aging's Community Care Program. Here are our comments and concerns regarding the Concept Paper for the 1115 Waiver.

- 1) The 1115 waiver provides the State of Illinois an opportunity to consolidate its current nine HCBS waivers; with such a consolidation the IACCPHP recommends that the consolidated structure also extend to provider agencies of HCBS services, in that all home and community based services be accessible to a provider agency that meets the state's established standards of service. More specifically, it is recommended that in a consolidated environment, all providers should be held equally accountable to a universal set of standards; have access to serve all the populations being served within the 1115 waiver; have a single contract with the State and a single audit process.
- 2) Please explain the impact an 1115 waiver would have on the state entitlement nature of both the IDOA CCP and DORS HSP client populations? Currently, both programs operate as state entitlements as a result of court-ordered consent decrees. The waiver caps on both CCP and HSP client caseload are significant enough in size that there is no concern of a waiting list. Will these populations be at risk of being wait-listed under an 1115 waiver?
- 3) Much of the dialogue around the 1115 proposal is to increase service coverage and access. How will Service Cost Maximums (SCMs) be determined for all nine HCBS waiver populations to ensure equitable coverage and access to services? At this time, is it the State's vision that all HCBS waiver consumers will have access to a comprehensive list of covered waiver services?
- 4) The IACCPHP is supportive of the direction the State wants to take with offering behavioral health services to all HCBS waiver consumers. Based on member agency feedback, a significant number of seniors currently receiving services through the CCP are in need of and would benefit from behavioral health services. It is imperative that when the State offers these services to waiver consumers, the supply of such services equals the demand. In the event of a statewide shortage of behavioral health, or any other waiver service, what will be the process for prioritizing the authorization of services for only some of the consumers in need?
- 5) An essential element for the 1115 waiver is the state's assurance of a comprehensive quality strategy that integrates with all Medicaid funded systems and initiatives. IACCPHP strongly recommends that all entities delivering in-home care be held to the same quality standards and mandated levels of monitoring. In-home care services must be safe for the consumers, with readily available safeguards to ensure continuity of service and ability to integrate service. We encourage routinely reported outcome-based results as an operating standard for HCBS.

Thank You,

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Executive Director